

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION**

THEODORE LUCIO, et al.,

Plaintiffs,

v.

EDW. C. LEVY CO., et al.,

Defendants.

* Case No. 3:15-CV-00613

* Judge Jeffrey Helmick

* **JOINT MOTION TO EXTEND DATES**

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Now come the parties, by and through counsel, and hereby request that all dates be extended 60 days to allow additional time for discovery and deposition necessary for expert disclosures. The parties propose the following dates:

- | | | |
|-----|---|-------------------|
| (1) | Discovery deadline: | February 19, 2016 |
| | Plaintiffs' expert disclosure and report: | February 19, 2016 |
| | Defendants' expert disclosure and report: | March 21, 2016 |
| (2) | Dispositive motion deadline: | April 1, 2016 |
| | Brief in opposition: | April 26, 2016 |
| | Briefs in reply: | May 10, 2016 |

Respectfully submitted,

/s/ Kevin J. Boissoneault

Kevin J. Boissoneault
Attorney for Plaintiffs

/s/Stuart J. Goldberg

Stuart J. Goldberg
Attorney for Edw. C. Levy Co.

/s/ Charles E. Ticknor

Charles E. Ticknor
Attorney for North Star BlueScope Steel

Motion Granted.
So Ordered.

s/ Jeffrey J. Helmick
United States District Judge